UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

PAULA F. SOTO,
 	
                                    Plaintiff,
 	
v.
 	
CITY OF CAMBRIDGE,
 	
                                    Defendant.
	Civil Action No. 1:13-cv-10822-JGD

DECLARATION OF KEVIN S. PRUSSIA IN SUPPORT OF
PLAINTIFF PAULA F. SOTO'S MOTION FOR SUMMARY JUDGMENT

I, KEVIN S. PRUSSIA, pursuant to 28 U.S.C. § 1746, hereby declare the following

under penalty of perjury:

1.   I am a partner at the law firm of Wilmer, Cutler, Pickering, Hale and Dorr LLP,

and am counsel of record for Plaintiff Paula F. Soto in this action. I am a member in good

standing of the bar of Massachusetts and I am admitted to practice in the United States District

Court for the District Massachusetts. I submit this declaration in support of Plaintiff's Motion

for Summary Judgment. I have personal knowledge of the statements contained in this

declaration and, if called as a witness, would testify competently to the statements contained in

this declaration.

2.   Attached hereto as <u>Exhibit A</u> is a true and accurate copy of Soto's Responses to

Defendant City of Cambridge's (the "City") Requests for Production of Documents, dated

August 12, 2014.

3.   Attached hereto as <u>Exhibit B</u> is a true and correct copy Soto's Responses to the

City's Requests for Admission, dated January 15, 2015.

4.   Attached hereto as <u>Exhibit C</u> is a true and accurate copy of Soto's Statement Submitted to the Cambridge City Council dated May 5, 2014 and made available at http://www2.cambridgema.gov/CityOfCambridge_Content/documents/140505%20soto%20com_1.PDF.

5.   Attached hereto as <u>Exhibit D</u> is a true and correct copy of a Letter from City Clerk to City Solicitor dated May 15, 1992, Bates COC 7 – 9.

6.   Attached hereto as <u>Exhibit E</u> is a true and correct copy of the pre-1992 City Council Ordinance 9.04.050, Bates COC 5.

7.   Attached hereto as <u>Exhibit F</u> is a true and correct copy of the deposition transcript of the City's 30(b)(6) Designee, Police Commissioner Robert C. Haas, dated November 12, 2014.

8.   Attached here to as <u>Exhibit G</u> is a true and correct copy of Letter from City Manager to City Council dated March 16, 1996, Bates COC 41.

9.   Attached hereto as <u>Exhibit H</u> is a true and correct copy of a screenshot of the Cambridge City Council's Website as of March 16, 2015.

10.   Attached hereto as <u>Exhibit I</u> is a true and correct copy of the Minutes from the Cambridge City Council's Ordinance Committee Meeting dated June 18, 2014, Bates 447-48.

11.   Attached hereto as <u>Exhibit J</u> is a true and correct copy of the deposition transcript of City Compliance Officer, Vincent Best, dated September 24, 2014.

12.   Attached hereto as <u>Exhibit K</u> is a true and correct copy of the City's Responses to Soto's Requests for Production of Documents, dated August 4, 2014.

13.   Attached hereto as <u>Exhibit L</u> is a true and correct copy of the City's Response to Soto's Request for Production of Documents No. 7, Bates No. COC 114-71.

14.   Attached hereto as <u>Exhibit M</u> is a true and correct copy of the City's Response to Soto's Request for Production of Documents No. 7, Bates No. COC 172-351.

15.   Attached hereto as <u>Exhibit N</u> is a true and correct copy of relevant excerpts from Webster's Third New International Dictionary (2002).

I, Kevin S. Prussia, declare under the pains and penalties of perjury that the foregoing is true and correct. Executed in Boston, Massachusetts on March 16, 2015.

/s/ *Kevin S. Prussia*_____
Kevin S. Prussia

CERTIFICATE OF SERVICE

I, Julia M. Ong, hereby certify that a true and correct copy of the above document was filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 16th day of March 2015.

_/s/ Julia M. Ong_____
Julia M. Ong